

Law Offices

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HOLLAND & KNIGHT LLP

2099 Pennsylvania Avenue, N.W.
Suite 100
Washington, D.C. 20006-6801

202-955-3000
FAX 202-955-5564
www.hklaw.com

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FEDERAL COMMUNICATIONS COMMISSION
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October 18, 2002

EDWARD W. HUMMERS, JR.
202-457-7145

Internet
Address: ehummers@hklaw.com

VIA HAND DELIVERY

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Petition for Rule Making
Revision to Television Table of Allotments

Dear Secretary Dortch:

Transmitted herewith on behalf of Channel 20 TV Company, licensee of Television Station KUPN, Sterling, Colorado, are an original and four copies of a supplement to the Petition for Rule Making filed on June 20, 2002. The Petition seeks to have NTCS Channel 3 and digital Channel 23 reallocated from Sterling to Fort Morgan, Colorado.

Should any questions arise concerning this matter please communicate with the undersigned.

Very truly yours,



Edward W. Hummers, Jr.
Counsel for
Channel 20 TV Company

Courtesy Copy
Roy J. Stewart, Esquire
John Karousos, Esquire

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**
Washington, D.C. 20554

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In the Matter of

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CHANNEL 20 TV COMPANY)
)
Amendment of Section 73.606(b))
Table of Allotments,)
TV Broadcast Stations. (Sterling,)
Colorado))
)
Amendment of Section 73.622(b),)
Table of Allotments,)
Digital Television Broadcast)
Stations. (Sterling, Colorado))

RM-_____

MM Docket No. _____

To: Chief, Video Division

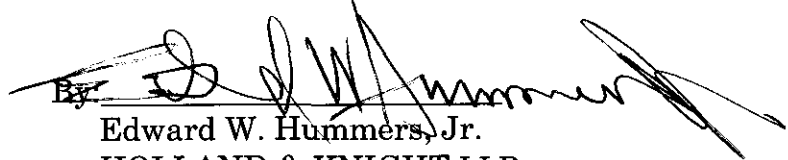
SUPPLEMENT TO PETITION FOR RULE MAKING

This is to supplement the Petition for Rule Making filed on June 20, 2002 which seeks to change the allotments of NTSC Channel 3 and Digital Channel 23 from Sterling, Colorado to Fort Morgan, Colorado. Attached hereto is the Supplemental Engineering Statement of Robert D. Culver, P.E. which demonstrates that a transmitter site meeting all of the coverage and separation requirements for both the analog and digital channels exists. Hence, a waive of Section 73.610 of the Commission's rules is no longer requested. The coordinates of the fully-spaced proposed site are: North Latitude 39° 56' 18"; West Longitude 103° 52' 06".

WHEREFORE, for the reasons set forth in the June 20, 2002 Petition for Rule Making, as modified herein, Channel 20 TV Company respectfully requests that the Commission amend the Television Table of Allotments and the DTV Table of Allotments by the reallocation of analog Channel 3 and digital Channel 23 from Sterling to Fort Morgan, Colorado, Colorado.

Respectfully submitted,

CHANNEL 20 TV COMPANY

A handwritten signature in black ink, appearing to read "Edward W. Hummers, Jr.", is written over a horizontal line. The signature is stylized and cursive.

Edward W. Hummers, Jr.
HOLLAND & KNIGHT LLP
2099 Pennsylvania Ave., N.W.
Suite 100
Washington, D.C. 20006-6801
Tel: (202) 457-7145

Its Attorney

Dated: October 18, 2002

**SUPPLEMENTAL ENGINEERING STATEMENT RE:
REALLOCATION AND UPGRADE KUPN(TV) AND KUPN-DT
FROM STERLING, COLORADO
TO FORT MORGAN, COLORADO
CH. 3-NTSC, 100 KW ERP, 600 METERS AAT
CH. 23-DTV, 480 KW ERP, 2103 METERS AMSL**

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DTV TO DTV INTERFERENCE ANALYSIS	FIGURE 2

Prepared by
Lohnes and Culver Washington, D.C.
October, 2002

**SUPPLEMENTAL ENGINEERING STATEMENT RE:
REALLOCATION OF KUPN(TV) AND KUPN-DT
CH. 3-NTSC, 100 KW ERP, 600 METERS AAT
CH. 23-DTV, 480 KW ERP, 2103 METERS AMSL
FROM STERLING, COLORADO
TO FORT MORGAN, COLORADO**

INTRODUCTION

This engineering statement is prepared on behalf of Channel 20 TV Company, licensee of KUPN, "KUPN" (formerly KTVS) at Sterling Colorado. KUPN is licensed on NTSC Channel 3 and has been paired with DTV Channel 23. KUPN has a pending application to reallocate NTSC Channel 3 and DTV Channel 23 from Sterling to Fort Morgan, Colorado and to relocate its NTSC and DTV transmitter facilities approximately 108 km southeast. That site creates a short spacing with NTSC station KREG-TV, Channel 3, in Glenwood Springs, Co. it is proposed to move the new KUPN location approximately 5 miles east, slightly closer to Fort Morgan, so as to relieve the NTSC Channel 3 short spacing. This statement contains technical information in support of the proposed change.

PROPOSED NTSC RELOCATION

The proposed relocated facility will be 100 kW at 600 meters AAT. The relocated transmitter site remains approximately 35 miles south of Fort Morgan and approximately 6 miles to the east-southeast of Hoyt, Colorado.

ALLOCATION STUDY - AREA COVERAGE

The relocation of KUPN requires analysis under the NTSC allocation distance restrictions for Zone 2 Low-VHF channels. The relocation and reallocation to the new site remains mutually exclusive with the present KTVS allocation at Sterling. The new site is fully spaced with all other stations and removes the short-spacing with the Co-channel operation of KREG-TV at Glenwood Springs, Colorado. The full allocation analysis is presented in Figure 1 attached to this statement. The NTSC Channel 3 relocation does not adversely impact any DTV allotment. Relocating slightly closer to Fort Morgan ensures continued City Grade coverage of that community. There will be no substantial change in coverage to the general area or gain and loss areas.

CONCLUSION: KUPN NTSC RELOCATION

KUPN NTSC Channel 3 can be relocated and reallocated to Fort Morgan, at the new fully spaced location, and still provide a large increase in service area and population, bring a new first service to the community and surrounding area as detailed in the pending KUPN application.

PROPOSED DTV RELOCATION

The KUPN DTV facilities will also be relocated to Fort Morgan. The relocation exceeds that permitted for a "check list" change, therefore, a DTV analysis, based on the newly specified transmitter site is presented below. The analysis presents the maximization ERP and antenna height consistent with the FCC required de minimus, 2% and 10% interference limits. The analysis is made using the methodology contained in the FCC DTV Rules and in FCC OET Bulletin 69.

PRESENT AND PROPOSED DTV SERVICE

Attached as Figure 2 is a table detailing the Appendix B allocation (before), and the proposed service and predicted interference (after) caused by the change. The maximum new interference does not exceed 2% of population, and the total interference received by any protected station does not exceed, or has not been increase if it does exceed, 10% of population.

CONCLUSION: KUPN DTV RELOCATION

KUPN-DT Channel 23 can be maximized, relocated and reallocated to Fort Morgan with an increase in service area and population, bring a new first DTV service to the community and surrounding area and with a minimum of predicted impact on other stations as required by the FCC Rules.

RESPECTFULLY SUBMITTED,
Lohnes and Culver

by; _____
Robert D. Culver, P.E.
Md. Reg. No. 19672
October, 2002

FIGURE 1
NTSC ALLOCATION STUDY
KUPN(TV) CHANNEL 3 100 KW ERP
CHANNEL 20 TV COMPANY
FORT MORGAN, COLORADO

<u>CHAN.</u>	<u>CALL</u>	<u>CITY, STATE</u>	<u>SEPARATION IN KM</u>	
			<u>ACTUAL⁽¹⁾</u>	<u>REQUIRED⁽²⁾</u>
2	KWGN-TV	Denver, CO.	119.3	95.7
3	KUPN(TV)	Sterling, CO.	100.9	304.9 ⁽³⁾
3	KREG-TV	Glenwood Springs, CO.	305.6	304.9
3	KSWK	Lakin, KS.	334.9	304.9
4	KCNC-TV	Denver, CO.	119.1	95.7

- Notes:
- (1) Calculated separation as per Section 73.611.
 - (2) Required separation as per Section 73.610.
 - (3) Relocated KUPN mutually exclusive allocation.

Proposed Coordinates;
 North Latitude 39° 56' 18"
 West Longitude 103° 52' 06"

Prepared by
 Lohnes and Culver Washington, D.C.
 October, 2002

FIGURE 2
DTV-TO-DTV INTERFERENCE ANALYSIS

<u>Analysis of Interference to Affected Station(s):</u>		<u>Initial Baseline Calculation (1990 Census)</u>	<u>Analysis of Current Record Before Proposal (1990 Census)</u>	<u>Analysis of Current Record After Proposal (1990 Census)</u>
22 KXRM-DT, COLORADO SPRINGS, CO. APPENDIX-B				
Population within Noise Limited Contour:			734,954	734,954
Population not affeted by terrain losses:			607,188	607,188
• Lost to all DTV and analog TV (NTSC) interference:			48,275	48,888
DTV SERVICE:			558,913	558,300
DTV/NTSC baseline population in <i>Appendix B</i> :		559,000	559,000	559,000
Percent of baseline population covered by DTV SERVICE:			99.98%	99.88%
Percent of DTV SERVICE impacted by proposal:		n/a	n/a	0.11%
22 KXRM-DT, COLORADO SPRINGS, CO. CP. BPCDT-991029IC				
Population within Noise Limited Contour:			1,187,556	1,187,556
Population not affeted by terrain losses:			871,877	871,877
• Lost to all DTV and analog TV (NTSC) interference:			260,602	260,956
DTV SERVICE:			611,275	610,921
DTV/NTSC baseline population in <i>Appendix B</i> :		559,000	559,000	559,000
Percent of baseline population covered by DTV SERVICE:			100.00%	100.00%
Percent of DTV SERVICE impacted by proposal:		n/a	n/a	0.06%
24 KRDO-DT, COLORADO SPRINGS, CO. CP. BPCDT-991026CY				
Population within Noise Limited Contour:			1,939,521	1,939,521
Population not affeted by terrain losses:			1,671,203	1,671,203
• Lost to all DTV and analog TV (NTSC) interference:			402,954	408,654
DTV SERVICE:			1,268,249	1,262,549
DTV/NTSC baseline population in <i>Appendix B</i> :		1,273,000	1,273,000	1,273,000
Percent of baseline population covered by DTV SERVICE:			99.63%	99.18%
Percent of DTV SERVICE impacted by proposal:		n/a	n/a	0.45%
23 KREG-DT, GLENWOOD SPRINGS, CO. CP. BPCDT-991029FR				
Population within Noise Limited Contour:			215,645	215,645
Population not affeted by terrain losses:			74,360	74,360
• Lost to all DTV and analog TV (NTSC) interference:			0	34
DTV SERVICE:			74,360	74,326
DTV/NTSC baseline population in <i>Appendix B</i> :		85,000	85,000	85,000
Percent of baseline population covered by DTV SERVICE:			87.48%	87.44%
Percent of DTV SERVICE impacted by proposal:		n/a	n/a	0.04%

I, Edward H. Hummers, Jr. certify that the FCC Registration Number (FRN) listed below is true and correct to the best of my knowledge, information and belief.

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[illegible]